



40 Broad Street, 7th Floor
New York, New York 10004
Telephone: 212.943.9080
www.vandalllp.com

Paige Piazza, Esq.
Associate
ppiazza@vandalllp.com

April 3, 2025

VIA ECF

Judge Joseph A. Marutollo, U.S.M.J.
United States District Court,
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Laduca et al v. Bari Home Care, LLC et al*, Docket No. 24-cv-07970 (LDH)(JAM)

Dear Judge Marutollo,

This firm is counsel to Plaintiffs in the above-referenced action. I write jointly with counsel for Defendants and in furtherance of this Court's February 20, 2025 Order requesting that Plaintiffs file their pre-motion letter by April 4, 2025. The Parties have stipulated to conditional collective action certification pursuant to 29 U.S.C. § 216(b). The Parties are currently conferring on the drafting of the Notice of Collective Action and Consent to Join form. Thus, the Parties respectfully request that the Parties be given until April 18, 2025 to submit the proposed Notice and Consent to Joint form for the Court's approval.

Thank you for your attention to this matter.

Respectfully submitted,
/s/ Paige I. Piazza, Esq.

Cc: All counsel of record (via ECF)